

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

PRECISION AIR, INC.,

Plaintiff,

v.

THEIA GROUP, INC. and KMR
AVIATION SERVICES, INC.,

Defendant.

C.A. No. 4:21-cv-2446 RBH

NOTICE OF EXTENSION OF RECEIVERSHIP STAY THROUGH OCTOBER 15, 2022

PLEASE TAKE NOTICE that on November 8, 2021, the Southern District of New York (the “Receivership Court”) entered an *Order Appointing Michael Fuqua as Receiver* (Doc. No. 117) (the “Receivership Order”) in the case styled *FCR Advisors, LLC v. Theia Group, Inc., d/b/a “Thorian Group” and/or “Cypherian”; Theia Aviation, LLC; and Theia Holdings A, Inc., d/b/a “Thorian Holdings,”* C.A. No. 1:21-cv-6995 (PKC) (the “Receivership Case”). A true and correct copy of the Receivership Order is attached as **Exhibit A** and is incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Receivership Order, the Receivership Court stayed (the “Receivership Stay”) any “action, proceeding, lawsuit or bankruptcy case against the Receivership Entities¹ or impacting the property and assets subject to this [Receivership] Order, including an action, proceeding or lawsuit heretofore commenced, without having first obtained leave of” the Receivership Court, for a period of 120 days following entry of the Receivership Order. Receivership Order, at ¶ 4. In addition, “[n]o person or entity, including any creditor or claimant against any of the Receivership Entities, or any person acting

¹ The term “Receivership Entities” is defined the Receivership Order as, collectively, Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc. *See* Receivership Order, at ¶ 1.

on behalf of such creditor or claimant, shall take any action to interfere with the taking control, possession, or management of the assets” of the Receivership Entities. *Id.*, at ¶ 5.

PLEASE TAKE FURTHER NOTICE that, on July 14, 2022, the Receivership Court entered an *Order* (Doc. No. 270) (the “Stay Extension Order”) in the Receivership Case, pursuant to which the Receivership Court further extended the Receivership Stay through and including October 15, 2022. A true and correct copy of the Stay Extension Order is attached as **Exhibit B** and is incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that one or more of the Receivership Entities is a named defendant in the above-captioned action. Accordingly, the Receiver respectfully submits that this action has been stayed by the Receivership Order and the Stay Extension Order until at least **October 15, 2022** (pending further order of the Receivership Court).

Dated: August 24, 2022

NELSON MULLINS RILEY
& SCARBOROUGH LLP

/s/ Jody A. Bedenbaugh

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*Counsel for Michael Fuqua, in his
capacity as Receiver of Theia Group, Inc.,
Theia Aviation LLC, and Theia Holdings A, Inc.*

CERTIFICATE OF SERVICE

I, Jody A. Bedenbaugh, hereby certify that on this 24th day of August, 2022, I caused a true and correct copy of the *Notice of Extension of Receivership Stay Through October 15, 2022* to be filed via CM/ECF, thereby providing notice of such filing to all registered participants. I further certify that I caused copies of the foregoing document to be served on the following counsel of record via e-mail:

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